

MEMO ENDORSED

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The Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Wilmington Trust, National Association, as Trustee for the
Benefit of the Registered Holders of Well Fargo Commercial
Mortgage Trust 2018-C46, Commercial Mortgage Passthrough
Certificates, Series 2018-C46 v. Eastgate Whitehouse LLC, et al
Case No. 22-cv-04326-VEC

**Request for Consensual Three (3) Week Extension of Dates in
Connection with Motion for Appointment of Receiver**

Dear Judge Caproni:

We are attorneys for Eastgate Whitehouse LLC, a defendant in the above-referenced civil action (“Eastgate”). This letter is being submitted with the consent of Wilmington Trust, National Association, as Trustee for the Benefit of the Registered Holders of Well Fargo Commercial Mortgage Trust 2018-C46, Commercial Mortgage Passthrough Certificates, Series 2018-C46, the plaintiff in the above-action (“Plaintiff”).

By order to show cause, dated July 15, 2022 [ECF Doc. #21] (the “Order to Show Cause”), this Court scheduled a hearing on July 29, 2022 at 10:00 am in connection with Plaintiff’s motion for the appointment of a receiver in this above-action (the “Receiver Motion”). In the Order to Show Cause, this Court set July 20, 2022 as the deadline for Eastgate and the other defendants to submit objections to the Receiver Motion, and July 27, 2022 as the deadline for Plaintiff to file any reply to such objections.

Based upon settlement discussions had during this week, counsel for Plaintiff advised us today that it would consent to an adjournment of the hearing on the Receiver Motion for up to 3 weeks from July 29, 2022 to August 19, 2022, and an extension of the time of defendants in this action, including Eastgate, to object to the Receiver Motion from July 20, 2022 to August 10, 2022, and Plaintiff’s time to reply from July 27, 2022 to August 17, 2022.

Accordingly, Eastgate respectfully requests that the Court: (i) adjourn the hearing in connection with the Receiver Motion for 21 days from July 29, 2022 at 10:00 am to **August 19, 2022 at 10:00 am**; (ii) extend Defendants' time to object the Receiver Motion for 21 days from July 20, 2022 to **August 10, 2022**; and (ii) extend Plaintiff's time to reply for 21 days from July 27, 2022 to **August 17, 2022**. This is the first request made for an adjournment of the hearing in the Receiver Motion and the related deadlines. If this Court is unable to schedule a hearing on August 19, 2022, then the parties' consent to a shorter extension of these respective dates.

Should Your Honor have any questions or concerns, please have your Clerk contact the undersigned

Respectfully Submitted,

/S/ Joel Shafferman

Joel Shafferman

Cc: Vivian M. Arias, Esq. (by email)

Application GRANTED. The show-cause hearing currently scheduled for Friday, July 29, 2022 at 10:00 a.m. is hereby ADJOURNED until **Wednesday, August 24, 2022, at 10:00 a.m.** Defendants' deadline to file response papers is hereby ADJOURNED until **August 10, 2022**, and Plaintiff's time to reply is hereby ADJOURNED until **August 17, 2022**.

SO ORDERED.

Handwritten signature of Valerie Caproni in blue ink, with the date 7/21/22 written below it.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE